

# **EXHIBIT 21**

## Safeguarding your data

This article summarizes Google Analytics' data practices and commitment to protecting the confidentiality and security of data. Visitors to sites or apps using Google Analytics (aka "users") may learn about our end user controls.

Site or app owners using Google Analytics (aka "customers") may find this a useful resource, particularly if they are businesses affected by the [European Economic Area's General Data Protection Regulation](#), or [California's California Consumer Privacy Act](#). See also [the Google privacy policy](#) and Google's site for [customers and partners](#).

## Information for Visitors of Sites and Apps Using Google Analytics

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### [Our privacy policy](#)

At Google, we are keenly aware of the trust you place in us and our responsibility to keep your privacy and data secure. As part of this responsibility, we let you know what information we collect when you use our products and services, why we collect it, and how we use it to improve your experience. The [Google privacy policy & principles](#) describes how we treat personal information when you use Google's products and services, including Google Analytics.

### [Google Analytics cookies and identifiers](#)

Google Analytics mainly uses first-party cookies to report on visitor (aka. user) interactions on Google Analytics customers' websites. Users may disable cookies or delete any individual cookie. [Learn more](#)

In addition, Google Analytics supports an optional browser [add-on](#) that - once installed and enabled - disables measurement by Google Analytics for any site a user visits. Note that this add-on only disables Google Analytics measurement.

Where a site or app uses Google Analytics for Apps or the Google Analytics for Firebase SDKs, Google Analytics collects an app-instance identifier — a randomly generated number that identifies a unique installation of an App. Whenever a user resets their Advertising Identifier (Advertising ID on Android, and ID for Advertisers on iOS), the app-instance identifier is also reset.

Where sites or apps have implemented Google Analytics with other Google Advertising products, like Google Ads, additional advertising identifiers may be collected. Users can opt-out of this feature and manage their settings for this cookie using the [Ads Settings](#). [Learn more](#)

Google Analytics also collects Internet Protocol (IP) addresses to provide and protect the security of the service, and to give website owners a sense of which country, state, or city in the world their users come from (also known as "IP geolocation"). Google Analytics provides a method to mask IPs that are collected (detailed below) but note that website owners have access to their users' IP addresses even if the website owners do not use Google Analytics.

## Information for Sites and Apps Using Google Analytics

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### [Google Analytics under the General Data Protection Regulation \(GDPR\)](#)

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### [Google Analytics under the California Consumer Privacy Act \(CCPA\)](#)

In order to help Google Analytics customers prepare for the CCPA, we have updated our [Data Processing Terms](#) to include a CCPA service provider addendum. Subject to the full terms of this addendum, Google Analytics will act as a service provider to its customers (when data sharing with Google products and services is disabled) and as such, will only use data collected on behalf of the customer in Google Analytics to provide the Google Analytics services. Customers who have not accepted our [Data Processing Terms](#) can do so [per these instructions](#). Customers who have already agreed to our [Data Processing Terms](#) will not need to take additional action to accept the CCPA service provider addendum. Customers should review the CCPA service provider addendum, as well as Google Analytics' use of data, to ensure it meets customer's compliance needs.

To help customers manage their compliance needs, Google Analytics offers a collection of tools, detailed below, that enable you to control how data is collected, and whether it is used for advertising personalization.

If you have linked Google Analytics to another product, please refer to [Google Analytics linking overview](#).

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## Google Analytics under the Lei Geral de Proteção de Dados (LGPD)

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### International transfers

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#### Data Collected by Google Analytics

##### First-party Cookies

Google Analytics collects first-party cookies, data related to the device/browser, IP address and on-site/app activities to measure and report statistics about user interactions on the websites and/or apps that use Google Analytics. Customers may customize cookies and the data collected with features like [cookie settings](#), [User-ID](#), [Data Import](#), and [Measurement Protocol](#). [Learn more](#)

Google Analytics customers who have for instance, enabled the analytics.js or gtag.js collection method can control whether or not they use cookies to store a pseudonymous or random client identifier. If the customer decides to set a cookie, the information stored in the local first-party cookie is reduced to a random identifier (e.g., 12345.67890).

For customers who use the Google Analytics for Apps SDK, we collect an App Instance Identifier, which is a number that is randomly generated when the user installs an app for the first time.

##### Advertising identifiers

Where customers use [Google Analytics Advertising Features](#), Google advertising cookies are collected and used to enable features like Remarketing on the Google Display Network. These features are subject to the users' [Ads Settings](#), the [Policy requirements for Google Analytics Advertising Features](#) and [Google's EU User Consent policy](#), which requires customers to obtain consent for cookies where legally required—including consent for personalized ads. For more information about how Google uses advertising cookies, visit the [Google Advertising Privacy FAQ](#). It is possible to implement Google Analytics without affecting normal data collection where Advertising features are disabled until consent is obtained (see [Privacy Controls in Google Analytics](#)), as well as prevent certain data from being used for advertising personalization purposes (See [Advertising Personalization below](#)).

##### IP Address

Google Analytics uses IP addresses to derive the geolocation of a visitor, and to protect the service and provide security to our customers. Customers may apply [IP masking](#) so that Google Analytics uses only a portion of an IP address collected, rather than the entire address. In addition, customers can override IPs at will using our [IP Override feature](#).

##### PII Prohibition

Our contracts prohibit customers from sending [Personally Identifiable Information](#) to Google Analytics. Customers should follow these [Best Practices](#) to ensure PII is not sent to Google Analytics.

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#### What is the data used for?

Google uses Google Analytics data to provide the Google Analytics measurement service to customers. Identifiers such as cookies and app instance IDs are used to measure user interactions with a customer's sites and/or apps, while IP addresses are used to provide and protect the security of the service, and to give the customer a sense of where in the world their users come from. Customers may also choose to use the data collected by Google Analytics for site/app personalization or advertising purposes, including ads personalization (See [Advertising Personalization below](#)).

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#### Data access

We do not share Google Analytics data without the customer's authorization (including via settings in the product user interface), or as otherwise expressly permitted under the terms of their Google Analytics agreement, except in limited circumstances when required by law.

Customers may control their own access to data in their Analytics accounts or properties by configuring view and edit permissions for employees or other representatives who may login to their Analytics account. [Learn more](#)

Security-dedicated engineering teams at Google guard against external threats to data. Internal access to data (e.g., by employees) is limited by strict access controls (both internal policy controls and automated technical controls such as authentication, SSL, and security logs) to only those with a business need to access it.

## Product linking summary

Where customers link their Analytics property to another Google product or service account ("Integration Partner"), certain data from that Analytics property may be accessed and exported into the linked account. Once data is exported through a linking integration, it becomes subject to the Integration Partner's terms and policies.

Note that once data is sent to an Integration Partner, that the data sent is subject to the terms of that Integration Partner and that Google Analytics no longer maintains access or control over that data.

Customers may review and manage their product integration linkings at any time within the Analytics product linking summary user interface.

## Data Sharing

Google Analytics provides several data sharing settings to customers, through which customers may customize how data collected using an Analytics data collection method (like the JavaScript code, mobile SDKs, and the Measurement Protocol) may be accessed and used by Google according to customer preferences. Note that these settings only apply to data collected from websites, mobile apps, and other digital devices using Analytics; they do not apply to data relating to a customer's use of Analytics, such as the number of properties and which additional features are configured. Regardless of a customer's data sharing settings, Analytics data may also be used only insofar as necessary to maintain and protect the Analytics service. [Learn more](#)

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### Data Controls for retention, deletion, and portability

#### Data Retention

With the [Data Retention controls](#), customers can limit or expand the duration for which their user-level and event-level data is stored in Google Analytics servers. All customers should review their Data Retention settings and ensure the appropriate retention is selected.

#### User Deletion

Customers may delete a single user's data from Google Analytics by passing a single user identifier to the [Google Analytics User Deletion API](#) or via our [User Explorer report](#).

#### User-level Data Access and Portability

Customers may pull event information for any given user identifier via our [User Explorer report](#) or the [User Activity API](#). These features enable customers to analyze and export event level data for a single user identifier. In addition, our 360 customers may integrate with BigQuery to create a full export of all event data associated with their users in a single queryable repository.

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### Advertising Personalization

Customers may choose to limit use of their analytics data for advertising personalization purposes, instead of disabling the collection of all analytics data or advertising identifiers (see "[Privacy Controls in Google Analytics](#)"). For example, a customer may choose to enable Google signals to better understand how many unique users visit their website across devices, but restrict such data from being exported for remarketing into a linked ads account, such as Google Ads. Customers may choose to disable Advertising Personalization for data collected from their entire property, or to disable it for individual events or users (for [apps](#), [websites](#), and [measurement protocol](#)). Customers using Google Analytics for Firebase or App + Web properties may also [exclude specific events or user properties](#) (like 'purchase' or 'gender') from being used for Ads Personalization.

If any of 1) all property-level data, 2) individual events, or 3) specific event names or user properties have been excluded from ads personalization, then Analytics will append an additional signal (called 'npa') in Postbacks indicating that networks should not use the data for personalized advertising. Note that each network's treatment of such 'npa' signal is determined by such network.

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### Data privacy and security

## Certifications

### ISO 27001

Google has earned ISO 27001 certification for the systems, applications, people, technology, processes, and data centers serving a number of Google products, including Google Analytics. [Learn more about our ISO compliance, and download our certificate \(PDF\)](#) or [learn more about ISO 27001](#).

### Information security

In web-based computing, security of both data and applications is critical. Google dedicates significant resources towards securing applications and data handling to prevent unauthorized access to data.

Data is stored in an encoded format optimized for performance, rather than stored in a traditional file system or database manner. Data is dispersed across a number of physical and logical volumes for redundancy and expedient access, thereby obfuscating it from tampering.

Google applications run in a multi-tenant, distributed environment. Rather than segregating each customer's data onto a single machine or set of machines, data from all Google users (consumers, business, and even Google's own data) is distributed among a shared infrastructure composed of Google's many homogeneous machines and located in Google's data centers.

In addition, Google Analytics ensures secure transmission of its JavaScript libraries and measurement data. Google Analytics by default uses HTTP Strict Transport Security (HSTS), which instructs browsers that support HTTP over SSL (HTTPS) to use that encryption protocol for all communication between end users, websites, and Google Analytics servers. [Learn more](#)

### Operational security and disaster recovery

To minimize service interruption due to hardware failure, natural disaster, or other catastrophe, Google implements a comprehensive disaster-recovery program at all of its data centers. This program includes multiple components to eliminate single points of failure, including the following:

**Data replication** To help ensure availability in the event of a disaster, Google Analytics data stored in Google's distributed file system is replicated to separate systems in different data centers.

**Geographical distribution of data centers** Google operates a geographically distributed set of data centers that is designed to maintain service continuity in the event of a disaster or other incident in a single region.

**Resilient and redundant infrastructure** Google's computing clusters are designed with resiliency and redundancy in mind, helping minimize single points of failure and the impact of common equipment failures and environmental risks.

**Continuity plan in the event of disaster** In addition to the redundancy of data and regionally disparate data centers, Google also has a business-continuity plan for its headquarters in Mountain View, CA. This plan accounts for major disasters, such as a seismic event or a public-health crisis, and it assumes people and services may be unavailable for up to 30 days. This plan is designed to enable continued operations of our services for our customers.

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No